

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

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Rochelle Pouget

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Petitioner

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Civil No. 1:22-cv-00382-SE

v.

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John Coughlin, County Attorney, et al

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Respondent

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RESPONDENT COUNTY ATTORNEY'S MOTION TO DISMISS

Now Comes Respondent, Hillsborough County Attorney John Coughlin, submits this motion to dismiss and states as follows:

1. Petitioner fails to state a cause of action for which relief can be granted.
2. Petitioner's claim is barred by official and statutory immunities.
3. Due to the dispositive nature of this motion concurrence has not been sought Local Rule 7.1 (c).
4. Consistent with Local Rule 7.1, a Memorandum of Law and Declaration is submitted in support of this Motion to Dismiss.

WHEREFORE County Attorney Coughlin respectfully request that this Court:

- A. Grant this motion to dismiss; and
- B. Grant such further relief that his just.

DATED: May 30, 2023

Respectfully submitted,

John Coughlin,

Hillsborough County Attorney

/s/Carolyn M. Kirby

By: Carolyn M. Kirby, Esquire

329 Mast Road

Goffstown, NH 03045
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CERTIFICATION

I hereby certify that a copy of the within Motion to Dismiss I has been forwarded to all parties of record via the Court's electronic filing system.

/s/Carolyn M. Kirby
Carolyn M. Kirby, Esquire